

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

Abel, et al. v. Islamic Republic of Iran (1:18-CV-11837) (GBD) (SN)

DECLARATION OF FAMILIAL RELATIONSHIP

I, Julio Masa Lebron, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Julio Masa Lebron, and I am the step-father of Ana M. Centeno, who died on September 11, 2001 when the World Trade Center collapsed. I submit this Declaration for the purpose of demonstrating that Ana M. Centeno was the functional equivalent of my daughter.
2. While I am not Ana M. Centeno's biological father, for the reasons set forth below, I should be deemed the functional equivalent.
3. In 1968, I met Ana M. Centeno, who I affectionately called "Mel," when I started dating her mother and my wife of over fifty years, Antonia Torres Ayala. Mel was only 6 years old at the time.¹
4. A year later in 1969, we all moved in together as a family along with Mel's other siblings and lived in Jersey City, New Jersey.
5. I've always considered Mel my child, along her other siblings. Mel and her siblings were my children in every way, especially because their biological father, who lived

¹ My wife and I have been together for over fifty years and we were legally married on May 5, 1990.

in Puerto Rico, was not in their lives, did not financially support them, and passed away when Mel was 15 years old.

6. While my wife worked occasionally, I was the main provider and the primary financial supporter in our family. I maintained Mel along with her siblings and also filed income tax returns with Mel and her siblings as dependents.

7. In addition to this financial support, I treated Mel like my daughter, emotionally and socially. I would give me advice (and, of course, discipline) like any loving father and as to the outside world, there was no question that Mel, and her siblings, were my children.

8. I taught Mel how to ride a bike and drive a car. I enjoyed taking Mel to the park and our family camping trips as well as to the arcade in Long Branch, New Jersey. When she was older, our relationship as father and daughter remained.

9. Mel lived with us until she became a young adult and moved out around 1984 when she was in her early 20s.

10. Even though she no longer lived at home, she moved close by in New Jersey and she would visit her mother and I often.

11. In 1998, Mel's mother and I moved to Puerto Rico where Mel continued to visit us often. She also started to financially help her mother and I when we needed it, such as when we were buying our house in Puerto Rico.

12. On September 11, 2001, Mel was taken from our family.

13. I remember clearly watching the devastating events unfold on the television. We held on hoping Mel had escaped. Unfortunately, after a few days, and knowing that her car was still in the same parking space she had left it, we had to accept the fact that Mel

was one of the victims and shortly thereafter held a funeral in her name. It was a difficult loss for her mother and I and the rest of the family and we treasure her memories.

14. In sum, Ana M. Centeno's, my stepdaughter, was very much my daughter in my life and we considered each-other to be father and daughter in every way.

15. I was in her life since she was a small child, lived with her entire childhood, supported her financial and emotionally as a father, and will miss her always as a father who lost his daughter. *See* Exhibit 1.

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Executed on: 8/14/9

Name (Signature): Julio Mosa

Name (Print): Julio Mosa Lebron

EXHIBIT 1



Julio took the picture.









